



THE CITY OF NEW YORK  
**LAW DEPARTMENT**

100 CHURCH STREET  
NEW YORK, NY 10007

MICHAEL A. CARDOZO  
*Corporation Counsel*

WESLEY E. BAUMAN  
*Assistant Corporation Counsel*  
Phone: (212) 788-0517  
Fax: (212) 788-9776  
wbauman@law.nyc.gov

March 30, 2012

**Via ECF and Regular Mail**

Honorable Nina Gershon  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Thompson v. City of New York, et al  
11 Cv. 4759 (NG)(RML)

Your Honor:

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel representing defendant City of New York (“defendant City”) in the above-referenced matter. This letter is submitted to advise the Court of the status of the above matter and request the scheduling of a pre-motion conference, in light of previous correspondence from both parties and pursuant to Your Honor’s Individual Motion Practices.

On December 23, 2011, defendant City requested a pre-motion conference concerning an anticipated motion to dismiss on the ground that plaintiff’s action is barred by a General Release signed on or about October 14, 2011. On February 17, 2012, plaintiff requested a stay of defendant City’s request. On March 23, 2012, plaintiff filed a letter response opposing defendant City’s request. Your Honor’s Individual Motion Practices § 3(A) require a pre-motion conference before a party is allowed to make a dispositive motion. In light of defendant City’s initial request and plaintiff’s letter response (also required under § 3(A)), defendant City respectfully requests that a promotion conference be scheduled to discuss its anticipated motion to dismiss.

Respectfully submitted,

/s/

Wesley E. Bauman  
Assistant Corporation Counsel

cc: Christopher D. Wright, Esq. (By ECF)